UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA, Plaintiff, vs. 33.92536 ACRES OF LAND, MORE OR LESS, SITUATED IN VEGA BAJA, COMMONWEALTH OF PUERTO RICO, AND JUAN PIZA BLONDET, AND UNKNOWN OWNERS Defendants.	CIVIL NO. 98-1664 (CCC) CIVIL NO. 98-2344 (CCC) Consolidated Cases

JOINT MOTION FOR ENLARGEMENT OF TIME

Plaintiff United States of America ("Plaintiff" or the "Government") and Defendant Juan Piza-Blondet ("Defendant"), pursuant to this Court's March 1, 2006 Order adopting the current discovery and pretrial schedule (Dkt. 117 and 118), respectfully submit this Joint Motion for an Enlargement of Time for discovery and pretrial deadlines. There being good cause for this motion, the parties state as follows:

1. The parties continue to work in an amicable manner to exchange written discovery materials and expert reports.

2. In an effort to minimize travel time and expenses, the parties have sought to schedule all depositions in this case during one contiguous period of time.

3. Because of scheduling conflicts in other cases, the parties have been unable to schedule depositions during a contiguous period of time before the March 15, 2006 close of discovery.

4. The parties now have scheduled depositions for the week of April 3, 2006.

5. On January 6, 2006, the United States served on Defendants the United States'

First Set of Interrogatories and Second Request for Production. Defendants' responses to these written discovery requests were due February 6, 2006.

6. Defendants have been unable to respond timely to the United States' written discovery requests because of difficulties locating and communicating with their client, Mr. Juan Piza-Blondet.

7. The United States has agreed not to file a motion to compel under Federal Rule of Civil Procedure 37(a) and to extend the deadline for Defendants to respond to these written discovery requests until March 31, 2006, on the condition that Defendants stipulate that if they fail to respond by that time will result in the following: (1) an automatic exclusion from trial of any previously unproduced information, documents or other evidence that is responsive to the United States' written discovery requests; and (2) the Defendants will be prohibited from supporting or opposing any claim or defense relating to the unfulfilled written discovery requests. Defendants have agreed to this condition.

8. The parties have agreed that both sides stand to benefit from obtaining a wetlands jurisdictional determination ("JD") from an outside environmental consultant that identifies wetlands on the subject property.

9. Accordingly, the parties have endeavored to jointly retain an environmental consultant who will prepare a JD for the subject property. The parties will provide a joint legal instruction to the environmental consultant regarding the scope of this assignment.

10. On March 1, 2006, this Court rescheduled the settlement conference in this case for May 24, 2006 at 5:00 p.m.

For the reasons stated above, the parties jointly propose the following extensions to the discovery schedule and pretrial deadlines:

Deadline for Defendants' Responses to United States' Written Discovery Requests	March 31, 2006
Close of Discovery	May 1, 2006
Court-ordered Settlement Conference	May 24, 2006
Daubert Motions	June 16, 2006

Counsel for both parties have agreed to jointly sign and submit this motion, which will be electronically filed by the United States.

Respectfully submitted,

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United States Attorney

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JUAN PIZA-BLONDET

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of March, 2006, a true and correct copy of the foregoing Plaintiff's First Request for Production was served via email and electronic filing addressed to:

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/s Jeffrey M. Tapick

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,)
)
Plaintiff,) CIVIL NO. 98-1664 (CCC)
) CIVIL NO. 98-2344 (CCC)
vs.) Consolidated Cases
)
33.92536 ACRES OF LAND, MORE)
OR LESS, SITUATED IN VEGA BAJA,)
COMMONWEALTH OF PUERTO RICO,)
AND JUAN PIZA BLONDET, AND)
UNKNOWN OWNERS)
)
Defendants.)

ORDER

IT IS HEREBY ORDERED, that the Joint Motion to Enlarge Time is hereby **GRANTED**.

IT IS FURTHER ORDERED, that the following discovery and pretrial deadlines be adopted in this proceeding:

Deadline for Defendants' Response to Written Discovery Requests	March 31, 2006
Close of Discovery	May 1, 2006
Court-ordered Settlement Conference	May 24, 2006
Daubert Motions	June 16, 2006

San Juan, Puerto Rico this _____ day of ____________ 200__.

____
DISTRICT JUDGE